

4.2.10 Vertical Service Codes (VSCs)

— Bellcore administers these resources today and NANPA, Inc., if selected, will continue to administer them subject to the guidelines and controls documented in this section of the Requirements Document. Use and ongoing enhancement of the Bellcore-developed tools will continue. All specified documentation and reporting requirements will be met. NANPA, Inc. will administer these resources subject to the performance commitments described in Section 1.6 of this proposal.

It should be noted that Bellcore was an active participant in the development of assignment guidelines for VSCs and helped to align the landline and wireless use of these codes.

4.2.11 Automatic Number Identification Information Integers (ANI II Digits)

Bellcore administers these resources today and NANPA, Inc., if selected, will continue to administer them subject to the guidelines and controls documented in this section of the Requirements Document. Use and ongoing enhancement of the Bellcore-developed tools will continue. All specified documentation and reporting requirements will be met. NANPA, Inc. will administer these resources subject to the performance commitments described in Section 1.6 of this proposal.

4.2.12 Non-Dialable Toll Points (NPA 886 and 889)

— Bellcore does not administer these resources today. NANPA, Inc., if selected, will administer them subject to the provisions documented in this section of the Requirements Document. All specified documentation and reporting requirements will be met. NANPA, Inc. will administer these resources subject to the performance commitments described in Section 1.6 of this proposal.

NANPA, Inc. will assist, if called upon, in an effort to eliminate these assignments if and when an alternative method is deployed for call completion/rating to locations served by these non-dialable toll points.

4.2.13 Additional NANPA Functional Requirements

For additional numbering resources that may be defined, NANPA, Inc. will a) provide input on its ability to assign and administer the numbering resources, b) participate in the development of assignment guidelines, and c) assume responsibility for the assignment and administration of these new resources. Certainly, we have done this many times in the past as new numbering resources are defined.

In addition, NANPA, Inc. will change its administrative and/or assignment procedures relative to the existing NANP numbering resources based on regulatory directives or approved changes to the assignment guidelines identified in Attachment 1 to the Requirements Document.

4.3 NANP Transition Plan

If NANPA, Inc. is selected to be the new administrator, the transition described in Section 4.3 of the Requirements Document is minimal, and there is little or no associated risk. The required transition plan, likewise, is minimal. There is work to be done during this period; viz., establishing a basis for the administration of non-dialable toll points and incorporation of additional reports on the web site. That effort, however, will not impact NANPA work or performance. We believe that any spare time available during this 90-day period can be well spent preparing for the central office code administration transition described in the next section of this proposal.

5. Central Office Code Administration

5.1 General Responsibilities

Section 5.1 of the Requirements Document describes five major functional categories that the new NANPA will be required to perform related to administration of the central office (CO) code resource. NANPA, Inc., if selected, will perform these function in accordance with these requirements as described in the following sections. NANPA, Inc. will manage the CO code resource in accordance with published INC guidelines which may be modified by the industry or appropriate regulatory action or statute. NANPA, Inc. brings to these tasks a unique body of experience that relates closely to the administration of CO codes and NPA relief planning. We would like to take this opportunity to explain these capabilities.

The current NANPA staff, which will be transferred to NANPA, Inc., has gained extensive experience in understanding the complexities of the CO code administration through direct involvement in the design of the guidelines document and in the administration of CO codes for Bermuda and 16 Caribbean countries. In 1991 the FCC asked Bellcore to lead an industry effort to develop and implement uniform guidelines for the assignment of CO codes. Bellcore prepared a strategy for accomplishing this task, developed a straw proposal, and gathered industry representatives together in a series of meetings to create the guidelines. Over the next several years, with Bellcore providing leadership as an industry workshop co-chair, the industry successfully completed the assignment guidelines document and administrative procedures, and met

the FCC's objectives. When the guidelines were completed, Bellcore, at the request of the industry, conducted a training program to help U.S. code administrators to become familiar with the new guidelines.

Code applicants and administrators have often consulted Bellcore for interpretations of various assignment criteria, which have in some cases led Bellcore to recommend to the industry clarifications or changes to the guidelines. As co-chair of the ongoing CO Code Guidelines Workshop, Bellcore has been intimately involved and instrumental in making improvements to the guidelines. For example, Bellcore coordinated industry efforts that completed a redesign of Part 2 of the code application forms to be consistent with RDBS and BRIDS databases.

Bellcore has served for 14 years as the CO code administrator for Bermuda and 16 Caribbean countries that are part of the NANP, and has made hundreds of 809 NPA CO code assignments. When completed, the new CO code guidelines were introduced for use in the Caribbean and have been applied uniformly in the assignment of CO codes to these countries. Bellcore has been responsible for the entry of 809 CO code assignments into RDBS/BRIDS, a required enterprise service for the new NANPA, and is very familiar with the processes to perform this task. Most recently, as these countries have been assigned and now proceed to introduce their own area codes, Bellcore has assisted in a smooth transition of CO code administration and assignment responsibilities to these countries.

In regards to NPA relief planning, Bellcore was an active participant in and contributor to the development of the NPA Relief Planning Guidelines by the INC; and, as such, Bellcore is very familiar with the planning processes described in this document. Recently, because of concerns with trends in new NPA code assignments, Bellcore recommended improvements that were incorporated into the guidelines to encourage NPA relief coordinators, regulators, and the industry to take a longer range view of relief planning while at the same time providing additional code conservation measures to protect the NPA code resource. Other improvements recommended by Bellcore were included in the guidelines that help to protect and conserve the NPA resource.

In it's role as numbering administrator for the 809 NPA, Bellcore recognized the need to provide relief for the 809 NPA. With Bellcore's assistance and recommendations, a relief plan was developed that prevented NPA exhaust before relief could be provided. It is this leadership and experience that Bellcore brings to CO code administration.

Bellcore possesses in-depth experience in the management and administration of NPA codes, particularly with regard to NPA assignments. Since 1984, Bellcore has assigned nearly 100 NPAs, mostly for geographic NPA relief, with the great majority of these assignments occurring in the past five years. Bellcore has gained extensive experience and knowledge in the analysis of NPA code usage and exhaust through conducting the annual Central Office Code Utilization Survey (COCUS), and through a review and analysis of NPA relief plans submitted as part of each and every NPA code request. Bellcore has managed the COCUS project, and the mechanized systems

used for COCUS were developed by Bellcore and have been modified by Bellcore over the years to meet changing industry requirements.

In following industry assignment guidelines, Bellcore has reviewed numerous relief plans and fully understands NPA relief planning processes; i.e., the purpose and scope of industry meetings, the role of state regulators, the options available for NPA relief (splits, overlays), the criteria specified in relevant industry guidelines, and the relevant FCC directives. Bellcore brings to this work an unmatched understanding of the relevant history and assignment precedents along with in-depth experience and knowledge.

In addition, Bellcore has participated in the Canadian Steering Committee on Numbering (CSCN) and has actively assisted Canadian administrators in the modification of CO code assignment guidelines to meet the unique regulatory environment in Canada. This experience has provided insight into the Canadian regulatory and business environment that will be extremely helpful to NANPA, Inc. in meeting Canadian numbering assignment needs.

In summary, Bellcore has served the telecommunications industry for more than 14 years as the current NANPA, and consequently has developed extensive knowledge and experience in the areas of CO code assignment and administration in the U.S. and NPA relief planning for the entire area served by the NANP. Bellcore recognizes the size and complexity of the task of consolidating these key functions, currently performed by separate entities, into NANPA, Inc. in a smooth and seamless manner. Described later in this section are the detailed steps NANPA, Inc. will take to

develop the staff, tools, and additional knowledge and experience needed to effect the consolidation with minimal risk to the industry and the public.

Belcore recognizes the need for NANPA, Inc. to maintain working relationships with local regulators and to develop an in-depth knowledge of local/regional environments; e.g., geography, demographics, growth patterns, etc. To facilitate this, NANPA, Inc. will establish regional offices in which its NPA relief planning work will be based. Three regional offices, one of which will be co-located with the primary NANPA, Inc. office in New Jersey, have been assumed for planning purposes. During the transition process, described in Section 5.3 NANPA, Inc. staff will develop the necessary knowledge and experience to perform CO code administration by working side by side with current administrators.

The following sections present Belcore's proposals for performing the key functional requirements for CO code administration. For ease of reference, the section numbers and headings match those those in the Requirements Document.

5.2 Central Office Code Administration Functional Requirements

5.2.1 General Client Services

Statement of Performance

For those seeking information about CO code administration, NANPA, Inc. will provide various methods of obtaining general information or help as described in subsections 1, 2 & 3 of the

Requirements Document. NANPA, Inc. will establish a general telephone number at which callers can a) obtain information related to new NANPA processes, procedures, interfaces and service, b) obtain guidelines documents, or c) receive assistance in applying for numbering resource assignments. Callers will be directed to the appropriate administrator, depending on the subject of the call. Voice-mail will be available at all times, with a maximum call-back time of one business day.

The current Bellcore web site will be enhanced to incorporate CO code information, answers to frequently asked questions (FAQs), telephone numbers to call for specific topics, downloadable versions of the assignment guidelines, a list of NPAs that are in jeopardy, and CO code assignment procedures for NPAs in which extraordinary NPA-specific conservation procedures have been invoked, etc. An electronic mail address is available now on Bellcore's web site and will continue to be available for submission of e-mail requests for information and general comments on the information. Lastly, paper copies of assignment guidelines and application forms will be available through fax or mail at no charge, and paper copies of other documents will be available at a nominal charge (See Section 7 of this proposal).

NANPA, Inc. will provide assistance to clients who call the general information telephone number for information on numbering resources. Whenever applicable or appropriate, NANPA, Inc., with its extensive knowledge and understanding of NANP numbering resources, will provide

recommendations to clients that will enable the provisioning of new services while optimizing and conserving number resource utilization.

The Requirements Document specifies the administrator should maintain a working knowledge of local dialing plans. Bellcore has gained considerable knowledge in understanding local dialing plans by the annual publication of the NPA status document and the publication of new NPA Planning Letters, which contain the local dialing plans for new NPAs. In addition, Bellcore participated in the INC workshop development of a uniform dialing plan recommendation. During the transition of CO code administration, NANPA, Inc. will request local dialing plan information from the current administrator. This information will be stored and updated as changes are made or new NPA codes are introduced, and will be available on the web site as required in Section 9.6.3.

NANPA, Inc. will provide assistance to code applicants seeking assistance in completing Part 1 of the CO code application form by telephone, email, or fax. Based on Bellcore's experience in responding to many client contacts regarding CO code information and other numbering resources, a "frequently asked questions" section will be included on the web site to provide answers to the most common of these questions. In addition, sample completed Part 1 forms will be available on the web site as models for use as an aid in completing the Part 1 form.

In the same manner as above, applicants may seek and will receive assistance in completing Part 2 of the application form. Sample completed Part 2 forms will be provided on the web site. Entry of

Part 2 data into RDBS/BRIDS will also be provided by NANPA, Inc. as an enterprise service, as described in Section 7 of this proposal.

Inquiries regarding available CO codes in a given NPA will be accepted at the general information telephone number, by fax, or email. A response to fax or email inquiries will be provided within one business day. In addition, as specified in Section 9.6.3, NPA-NXX information will be provided and maintained on NANPA, Inc.'s web site.

5.2.2 Central Office Code Request Processing

Overview of Operations

To receive and process CO code application requests, NANPA, Inc. will establish a central Code Assignment & Administration Bureau (CAAB) in its New Jersey headquarters. Personnel associated with the assignment and administration of CO codes will be located in the CAAB, and all CO code applications and requests for information related to CO code administration will be directed to the CAAB.

Requests for CO codes and related questions by clients will be processed by code administrators (CAs), who will be recruited for their qualifications and experience in CO code request processing and/or will receive appropriate training as part of the transition process described in Section 5.3. CO code information data entry will be performed by database administrators (DAs).

Centralization of CO code request processing provides several benefits. First, the development of the CO code guidelines was originally undertaken to provide consistency in the assignment process, and centralization will foster consistency in response to code applicants. CAs will be trained to process applications in a consistent manner in conformance with the guidelines, and close supervision will support and maintain the desired consistency. Centralizing CO code administration will provide economies of scale, reducing costs to the industry while allowing for contingencies such as vacations or illness. Lastly, a centralized staff will enable administrators to do load balancing, shifting resources to assist a particular region of the NANP that might be receiving an unusually large number of assignment requests.

Individual CAs may be assigned as primary contacts for particular regions of the U.S. in order to better understand and track local conditions that might impact CO code assignments. For example, the CA may need to understand how the routing of calls on a particular applicant's network might place limitations on the CO codes that can be assigned to that applicant. Although primarily responsible for assignments in a particular region, CAs will be cross-trained to assist in assignments outside of their regions, as necessary.

As described in Section 4 of the Requirements Document, the new NANPA will be responsible for preparing the annual COCUS. In NANPA, Inc. this responsibility will rest with the CAAB. Most of the effort in conducting COCUS comes in the gathering of CO code assignment information and

the 5-year demand forecasts from service providers. The methods and procedures for accomplishing the annual COCUS are included later in this section of the proposal.

After the transition of CO code request processing is completed, the CAAB staff will consist of 10 code administrators, database administrators and support staff as shown in the following table.

This staffing projection is based on the current rate of 10,000 CO code assignment requests per year. Processing activities performed by these individuals include review of submitted forms, logging information, calling applicants as necessary to get information, tracking status, reporting, notifying the applicant, and tracking code activation.

CODE ASSIGNMENT AND ADMINISTRATION BUREAU	
Title/Function	Staff
Director - CO Code Administration	1
Code Administrator	6
Database Administrator	2 *
Staff Associate	1

*Note: For planning purposes, the database administrators shown are those necessary to support the code administrators and to enter the required RDBS ACD screen data. Additional database administrators may be required to support entry of Part 2 information into RDBS/BRIDS as an enterprise service.

The following Statement of Performance is a description of how NANPA, Inc. proposes to satisfy the requirements of CO code request processing described in subsections 1 through 8 of Section 5.2.2 of the Requirements Document. All requirements described in this section have been included in this proposal and will be performed by NANPA, Inc. as specified.

Statement of Performance

Clients requesting a CO code assignment may submit their requests (Part 1) to the CAAB by fax, mail, express mail or electronically by email. Each application will be time-stamped when received and assigned a tracking number. A confirmation form will be immediately forwarded to the client via fax or email and U.S. mail, indicating that the application has been received. The confirmation will show the tracking number, the time and date when the code application form was received, and also will indicate to the client when a response can be expected, e.g., within 10 working days. The name and telephone number of a contact in the CAAB will be provided in case the applicant has questions concerning any aspect of the application process.

CO code applications will be reviewed by a code administrator for completeness, eligibility, and other criteria specified in the guidelines. The code administrator will contact the client, as necessary, for clarification or to request any additional information required by the guidelines. If the NPA in question is not in jeopardy (as defined by the CO code guidelines), the code administrator will determine if the code requested will be assigned, denied, or if a request for additional information is needed. Part 3 of the application form will be used for this purpose. Part 3 will be sent to the client by fax, followed by U.S. mail (including the fax confirmation form). The assignment confirmation form, i.e., response to a CO code application will be processed within the required response period, i.e., 10 working days, specified in the guidelines.

In carrying out their responsibilities, NANPA, Inc. code administrators will insure that a) code assignments conform to code conservation practices described in the CO code guidelines, b) that the assignments do not present dialing, routing and rating conflicts, c) that assigned codes do not conflict with NPAs that may have been reserved for future geographic NPA relief in that NPA, and that d) no other conflicts apply. Information necessary to perform these conflict checks will be requested and obtained from the current administrators during the transition of CO codes request processing to the new NANPA as described in Section 5.3.2. This information will be updated by the new NANPA on a going forward basis.

NANPA, Inc. code administrators will verify that the entity to which a code has been assigned has activated the code in accordance with the guidelines. To accomplish this, the code administrator will:

- a) Make a record when Part 4 of the CO code application form has been submitted by the client (in accordance with the guidelines), confirming the details of the code activation status. A system will be established to flag cases in which Part 4 has not been submitted within the required time period. When this occurs, the code administrator will immediately contact the client, in writing, to determine the status of code activation.
- b) The code administrator will also follow up after the effective date for activation of the CO code has passed to confirm that the code has, in fact, been activated.

- c) If confirmation of the activation of a code has not been obtained from either step above, and no satisfactory explanation is forthcoming from the code holder, the code administrator will initiate reclamation procedures in accordance with Section 7 of the CO code assignment guidelines.

When an NPA is in jeopardy, special procedures for processing client code assignment applications may be necessary. In some NPAs, where CO code assignment activity is particularly high, procedures for extraordinary NPA-specific conservation measures may have been established in accordance with Section 8.5 of the CO code assignment guidelines, and these procedures will be applied by the code administrator. For example, it may be necessary to implement a code rationing or lottery process for all code applications within a given NPA in accordance with specific procedures either agreed to by affected parties or directed by regulators. NANPA, Inc. code administrators will be aware of these special procedures and will apply them in accordance with the agreed-upon criteria (See Section 5.2.5 of this proposal for more detailed jeopardy NPA processes).

NANPA, Inc. will adopt assignment practices and administrative procedures, as necessary, to accommodate changes to the CO code assignment guidelines agreed to by the industry, or by regulatory directives. Bellcore has extensive experience working with the industry through the INC and has modified assignment procedures for numbering resources such as CO codes Carrier

Identification Codes, Vertical Service Codes, NPAs, etc. in accordance with the needs of the industry and the directives of the FCC.

The CAAB will be responsible for preparing COCUS. Most of the effort in conducting COCUS involves gathering of CO code assignment information and the 5-year CO code demand forecasts from service providers. The methods and procedures for accomplishing the annual COCUS will be essentially the same as those in use today.

The basis for COCUS studies will be historical information that will be provided by the current administrators as specified in Section 5.3.2 of the Requirements Document. The COCUS studies will be accomplished in the following manner:

1. For each active NPA, the CAAB will prepare a five-year projection of the demand for CO codes. This will be accomplished by sending a COCUS forecast form to each of the service providers in the NPA using the COCUS form in Appendix C of the CO code assignment guidelines. A listing of service providers will be provided by the current code administrators as part of the transition process and described in Section 5.2.3. Information provided on the COCUS forms is highly proprietary and sensitive, and the CAAB will insure that the information is properly safeguarded. Proprietary information submitted in conjunction with COCUS forecasts will be kept for a period not to exceed 1 year.

2. The responses to the COCUS forecast request will be aggregated and analyzed for reasonableness and accuracy. Any concerns about the information will be discussed with the service provider submitting the information.
3. Based on this aggregate information, a projection will be made as to when each NPA will exhaust. Linear regression analysis techniques are currently used to make the projection.
4. A report will be prepared showing the projected exhaust date of each NPA and the projected exhaust date from the previous COCUS for comparison purposes. The reports will present the data sorted by NPA, by location and by date of exhaust. A summary report will show NPAs projected to exhaust in the next 10 years, which will also appear in the annual NPA status report.
5. The report will be published in hard copy form, e.g., via Planning Letter, and will be made available to the public on the web page.

From time to time, it may become necessary to modify the COCUS analysis methodology or procedures based on input from either the new NANPA, the industry, or regulators. The new NANPA will make necessary modifications or changes to COCUS techniques in response to these needs.

5.2.3 Industry Notification Functions

Overview of Operations

The functions described in this section of the requirements document will be performed by the CAAB. The structure and operation of the CAAB is described in Section 5.2.2 of this proposal. Performance of the functions described in this section require on-line access to the RDBS/BRIDS databases, and that access arrangement is already in place.

The following Statement of Performance is a description of how NANPA, Inc. proposes to satisfy the requirements of the Industry Notification Functions described in subsections 1 through 3 of Section 5.2.3 of the Requirements Document. All requirements described in this section of the Requirements Document have been included in this proposal and will be performed by NANPA, Inc. as specified.

Statement of Performance

Within one business day following the assignment of a CO code to an applicant and the transmittal of the associated Administrator's Response / Confirmation Form (Part 3), a CAAB database administrator will enter the NPA/NXX, OCN, and effective date information into RDBS/BRIDS using the ACD screen. This will provide the necessary authorization for the applicant to enter appropriate Part 2 information into RDBS/BRIDS. The CAAB will respond to questions from the applicant, or from the Administrative OCN (AOCN) responsible for data entry on behalf of the client, pertaining to the status of the assignment or its initial entry into RDBS/BRIDS.

NANPA, Inc., currently has access to RDBS/BRIDS for entry of 809 NPA NXX assignments, therefore, no additional action is required. If the applicant has agreed to have the new NANPA enter the CO code Part 2 assignment information into RDBS/BRIDS as part of an enterprise service, a CAAB database administrator will do the following:

- a) Check the completeness and accuracy of the information on Part 2 of the form, and contact the applicant, as necessary, for additional information or clarification.
- b) Enter the Part 2 information into RDBS/BRIDS within 5 business days as specified in the guidelines.
- c) Confirm, in writing, to the client the date/time Part 2 information was entered into RDBS/BRIDS.

The Requirements Document specifies that the code administrator should assist in resolving call completion problems as specified in the CO code guidelines. In such cases, the caller reporting the problem will be referred to the CAAB. As a starting point, the CAAB will check the accuracy of the routing and rating information in RDBS/BRIDS. If appropriate, the CAAB will request that Bellcore's Traffic Routing Administration to issue an emergency notification. The CO code guidelines specify that for misrouted calls, trouble investigation should be initiated in the NPA in which the incompleting call originated. However, network routing problems are the responsibility of the customer's service provider. To assist in cleaning up a problem related to a misrouted call,

the CAAB will refer the caller who reported the problem to the responsible service provider contacts in the NPA of the call origination. Service provider contact information will be obtained from the current CO code administrators during the transition process as described in Section 5.3.2. This listing will be maintained and updated, as necessary, by the CAAB.

5.2.4 NPA Relief Planning

Overview of Operations

NPA relief planning, from Belcore's experience with current NPA relief coordinators in the assignment of NPAs, requires contact with industry representatives, local governments, the public and regulators. In the initial planning phases for NPA relief, NPA relief coordinators facilitate local meetings to discuss the available relief options. In these meetings, the facilitator attempts to reach consensus on a relief plan. In some jurisdictions, meetings with the general public and local government officials must be conducted as well, and these meetings are usually facilitated by the NPA relief coordinators. NPA relief coordinators in the new NANPA must be aware of local demographics, geography, growth patterns, local dialing plans, rate centers, applicable state laws, and other factors unique to the region in order to effectively assist and direct the relief planning process.

To provide the local presence and to develop and maintain the regional knowledge and experience, as well as to minimize travel time and costs, NANPA, Inc. proposes to distribute the NPA relief planning function by establishing regional offices. These offices will be called Regional NPA Relief

Centers (RNRCs) and will be staffed by NPA Relief Coordinators (NRCs) and support staff. The NRCs will be responsible for all aspects of NPA relief planning for NPAs within their region.

Three regional offices are planned and described herein. At start-up, one of the RNRC offices will be located in the eastern portion of the NANP area, co-located with the new NANPA headquarters, to cover relief planning for the Eastern portion of the U.S. Another RNRC will be located in the central part of the U.S., and a third RNRC will be located in the Western part of the U.S.

Additional RNRCs offices may be established in other regions, if necessary. Specific NPAs in the U.S. and its territories will be assigned to each of these regional offices, and these assignments will be made available to regulators, service providers and the public by various publications including the NANPA web site. Telephone contact numbers will be available for each of the RNRCs and published via the web site and other means, as necessary. NANPA, Inc. will recruit experienced NPA relief coordinators to staff the regional offices.

NPA relief planning for Canada (and other non-U.S. NANP countries) will be performed by these countries as they are today. Requests for NPA assignments from NPA relief coordinators from Canada and other non-U.S. NANP countries will be directed to the eastern RNRC.

NANP, Inc. will build a staff of 12 people to perform NPA Relief Planning. The staff will include 10 NPA Relief Coordinators (NRCs) and 2 support staff as shown in the following table:

REGIONAL NPA RELIEF CENTERS			
Title/Function	Western Region Staff	Central Region Staff	Eastern Region/HQ Staff
Director - NPA Relief Coordination			1
NPA Relief Coordinator (NRC)	2	2	2
Assistant NPA Relief Coordinator	1	1	1
Staff Associate	1	1	

Each RNRC will function autonomously, fully responsible for all relief activity for NPAs within its assigned area. The Director - NPA Relief Coordination will supervise the NPA Relief Coordinators and will perform oversight functions such as preparation of reports, analysis of relief activities, contacts and legal filings with state regulators, contacts with the media related to new NPAs, etc.

The Director - NPA Relief Coordination will work closely with the Director -CO Code

Administration (see Section 5.2.2) to review code assignment activity and the relationship to exhaust, the status of relief activities, jeopardy situations, NXX forecasts, etc. The Director of the RNRC will review all proposed NPA assignments for consistency with industry guidelines and will identify and assess unusual circumstances, e.g., multiple relief activities in a given NPA, that are not covered by the guidelines and determine if further direction is necessary from the INC, NANC, the FCC, or other regulators.

The following Statement of Performance is a description of how NANPA, Inc. proposes to satisfy the requirements of NPA Relief Planning as described in subsections 1 through 13 of Section 5.2.4

of the Requirements Document. All requirements described in this section have been included in this proposal and will be performed by NANPA, Inc. as specified.

Statement of Performance

NANPA, Inc. will perform the following NPA relief planning activities in accordance with applicable industry guidelines, e.g., NPA Relief Planning Guidelines, NPA Assignment Guidelines and Allocation Plan, Industry Notification of NPA Relief Activity Guidelines and Recommended Notification Procedures to Industry for Changes in Access Network Architectures, including any changes or modifications to these and other relevant documents the industry or regulators deem appropriate. NANPA, Inc. will work with local regulators in those cases where regulators choose to perform some of the NPA relief activities themselves.

The RNRCs will monitor exhaust situations, using COCUS and monthly CO code assignment reports from the CAAB, for each of the NPAs within their region and will determine when each NPA is likely to exhaust. The objective is to plan far enough in advance to permit orderly development of a relief plan, in conjunction with the industry, the regulators and the public, that will prevent NPA exhaust and provide sufficient numbering resources for service providers.

Currently, COCUS is conducted annually; however, in areas where number activity is changing rapidly, i.e., going beyond current forecasts, the RNRCs will review these situations and augment COCUS projections more often, if necessary.

For NPAs exhausting within the next four years, the RNRC will determine the need for and identify the timing of NPA relief. An NPA relief schedule will be developed for each exhausting NPA sufficiently far in advance to provide the required relief and to allow time for completion of the activities specified in the guidelines. As mentioned, the objective here is to plan far enough ahead, to anticipate problems, and to get approval of a relief plan as early as possible to meet the requirements of the guidelines. For example, the NPA Relief Planning Guidelines call for a notice to all service providers one year prior to the NPA relief date to allow time to plan for the and, very importantly, to prevent premature exhaust of the NPA while providing sufficient numbers to all service providers. The RNRC will apply, as appropriate, the criteria in the NPA Relief Planning Guidelines. For example, Section 4 of that document encourages longer range NPA relief planning, and suggests, where applicable, the inclusion in the plan of multiple relief activities.

The RNRC will identify critical situations where unanticipated demand for numbers might outstrip the forecast and threaten to create a jeopardy situation. Currently, 18 NPAs are in jeopardy in the U.S., with more expected. Procedures that the RNRC will adopt to deal with jeopardy situations are covered in Section 5.2.5 of this proposal.

For NPAs requiring relief that are not in jeopardy, or are not anticipated to be in jeopardy, the RNRC will promptly communicate with all affected parties, i.e., code holders and potential code holders, and appropriate regulators to advise them that relief planning needs to occur. During the transition process, the RNRCs will obtain affected party names and contact information from the